

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:	)	Chapter 11
	)	
Squirrels Research Labs LLC, <i>et al.</i> <sup>1</sup>	)	Case No. 21-61491
	)	(Jointly Administered)
Debtors.	)	
	)	Judge Russ Kendig
	)	

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**AFFIDAVIT OF THERESA M. PALCIC IN SUPPORT OF  
CONFIRMATION OF SQUIRRELS RESEARCH LABS LLC'S  
AMENDED PLAN OF LIQUIDATION DATED JUNE 2, 2022**

THERESA M. PALCIC, having been duly sworn, avers as follows:

1. I am a paralegal in the office of Brouse McDowell, LPA, counsel for Squirrels Research Labs LLC (the “Debtor”) in the above-captioned Chapter 11 cases (the “Chapter 11 Cases”).
2. My responsibilities at Brouse McDowell include the filing, servicing, and noticing of documents prepared by attorneys at the firm, including the attorneys working on these Chapter 11 Cases.
3. I submit this affidavit (my “Affidavit”) in support of confirmation of the Debtor’s Plan of Liquidation, as filed with the Court on February 21, 2022 [Doc. #169] (the “Plan”) and amended on June 2, 2022 [Doc. #237].
4. Unless specifically indicated otherwise, all capitalized terms in this Affidavit have the meanings ascribed to them in the Plan.

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<sup>1</sup> The debtors in these Chapter 11 cases, along with the last four digits of each debtor’s federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

5. Unless specifically indicated otherwise, all statements in this Affidavit are based on my personal knowledge and experience. If called upon to testify, my testimony would be consistent with this Affidavit. I have the authority to submit this Affidavit on behalf of Brouse McDowell and the Debtor.

### **SERVICE AND NOTICING**

6. In the Order on Motion for Establishment of Applicable Hearing Dates and Deadlines for Plan of Liquidation [Doc. #183] (the “Procedures Order”), the Court established procedures for the Debtor’s solicitation of a plan of liquidation. After the Procedures Order was entered, I oversaw the production and mailing of copies of the Plan, the Procedures Order, the notice of the confirmation hearing and objection deadline, the Ballots, as applicable and related solicitation materials to all creditors and parties in interest. That mailing was effected on March 28, 2022. The Certificates of Service reflecting this were filed with the Court on March 29, 2022.

7. All documents were prepared and mailed in good faith. I have made my best efforts to ensure that all documents reached all creditors and parties in interest.

### **BALLOTING**

8. When holders of Claims in Classes entitled to vote on the Plan (Class 4) submitted their Ballots, it was my responsibility to tabulate them. The voting deadline was April 25, 2022.


9. On April 6, 2022, a holder of a Class 4 Claim filed an objection to the Plan.

10. As of April 25, 2022, I had received thirteen Ballots from the holders of Claims in Class 4.

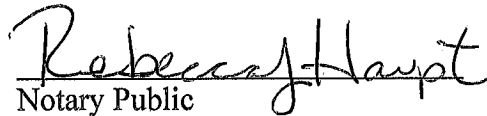
11. In Class 4, 76.92% by number and 5.03% by value of the Claims voted to accept the Plan.

12. In Class 4, 23.08% by number and 94.97% by value of Claims voted to reject the Plan.

AFFIANT FURTHER SAYETH NAUGHT.

  
Theresa M. Palcic

SWORN TO and subscribed before me this 2<sup>nd</sup> day of June, 2022.

  
Notary Public



Rebecca J. Haupt  
Notary Public, State of Ohio  
Resident Summit County  
My Commission Expires:  
April 6, 2023